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September 29, 2021

**VIA ECF**

Honorable André M. Espinosa  
United States District Court  
District of New Jersey  
Martin Luther King, Jr. Courthouse  
50 Walnut Street  
Room 2037, Courtroom 2D  
Newark, NJ 07102

**RE: Dotcom Distribution Corp. v.  
Travelers Property Casualty Company of America and  
The Phoenix Insurance Company  
No. 2:20-cv-17871**

Dear Judge Espinosa:

The parties jointly submit this letter in the above-referenced matter concerning the discovery dispute deadline.

Per the Scheduling Order [ECF No. 15], “[a]ny unresolved discovery disputes (other than those that arise during depositions) must be brought before the Court **no later than October 1, 2021** and the Court will not entertain applications concerning discovery matters, informally or otherwise, after this date.”

The Court recently extended the fact discovery deadline to January 1, 2022. *See* Court’s Order dated September 22, 2021 [ECF No. 27]. We write to the Court to confirm that the October 1, 2021 deadline is extended in accordance with the Court’s recent order.

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The parties agree to extend the discovery dispute deadline to December 1, 2021.

Respectfully submitted,

**FLASTER/GREENBERG P.C.**

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